

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SERVICE EMPLOYEES INTERNATIONAL)	
UNION, LOCAL 1,)	
)	
Plaintiff,)	
v.)	No. 08 C 1205
)	
THE WACKENHUT CORPORATION,)	Judge James B. Moran
)	
Defendant.)	

DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION
OF TIME IN WHICH TO ANSWER OR OTHERWISE
PLEAD AND FOR OTHER RELIEF

Defendant THE WACKENHUT CORPORATION, (“Wackenhut”), by its attorney Laurie E. Leader of the Law Offices of Chicago-Kent College of Law, hereby moves this Honorable Court to grant it an extension of time to and including April 29, 2008, in which to answer or otherwise plead to Plaintiff’s complaint, and for other relief. In support of this motion, Defendant states as follows:

1. Defendant recently retained Laurie E. Leader of the Law Offices of Chicago-Kent College of Law to represent it in the above-captioned matter. Defendant was served with Summons on March 6, 2008.
2. An extension of time is needed to investigate this matter based on the schedule of Defendant’s counsel. That schedule includes, without limitation, in the next thirty (30) days: a summary judgment response due in a class action entitled Nettles, et. al. v. Allstate, No. 02 CH 14426 (pending in the Chancery Division of the Circuit Court of Cook County); a publication due

for LEXIS/NEXIS; depositions in Madison, Wisconsin in Schultz v. American Family, Case No. Master Docket No. 06-CV-17430-WYD-CBS (MDL Docket No. 1743) (an MDL case pending in the District Court of Colorado); and an argument, also in Schultz, on class and discovery issues in the Denver district court. As a result of these and other commitments, Ms. Leader has requested an extension of time in which to answer or otherwise plead on behalf of Defendant to and including April 29, 2008.

3. This motion is not made for purposes of delay, but to allow Defendant's counsel sufficient time in which to investigate and appropriately respond to Plaintiff's complaint.

4. Plaintiff's counsel, Leslie J. Ward, indicated that she has no objection to the extension requested or to moving the status date from the April 15, 2008 date currently scheduled. Defendant's counsel has a scheduling conflict on the referenced status date.

WHEREFORE, Defendant prays that this Honorable Court grant Defendant an extension of time to and including April 29, 2008, in which to answer or otherwise plead to Plaintiff's complaint, reschedule the status date now set for April 15, 2008, and grant such other and further relief as this Court deems to be equitable and just.

THE WACKENHUT CORPORATION, Defendant

By: /s/ Laurie E. Leader
Attorney for Defendant

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